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January 3, 2018

**VIA ECF**

The Honorable Gary R. Brown  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Courtroom 840  
Central Islip, NY 11722

Re: *Parsley, et al. v. Broadhollow Hospitality LLC, et al.*  
Case No. 17-cv-00097 (JS)(GRB)

Dear Judge Brown:

Counsel for defendants Broadhollow Hospitality, LLC d/b/a Jewel Restaurant and Rubie's Costume Company, Inc., along with counsel for Plaintiffs write jointly in accordance with Rule I(D) of Your Honor's Individual Practice Rules to respectfully request that the Scheduling Order [Dkt. 20] be modified to extend the March 14, 2018 deadline for completion of all discovery by approximately 120 days. The reason for this request is to allow the parties sufficient time to complete Phase II discovery in the event the parties are unable to reach a resolution of this matter at the upcoming January 8, 2018 settlement conference.

While the parties are hopeful they will be able to reach an agreement at the settlement conference, to the extent they do not, the parties anticipate that they will need 120 days to complete Phase II discovery, *including* expert discovery. An extension of this length would allow sufficient time for the parties to complete document discovery, conduct party and non-party depositions<sup>1</sup> (and any additional discovery that arises based upon information gleaned at these depositions), as well as account for anticipated work on counsel's end.

<sup>1</sup> While the parties have not discussed depositions in detail, at a minimum, Defendants anticipate deposing Plaintiff Miglino and one or more of the opt-in Plaintiffs.

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Accordingly, the parties respectfully request that the Court extend the deadline for completion of all discovery from March 14, 2018 to July 13, 2018.

Respectfully submitted,

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